

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

SAVISTA, LLC,	)	
	)	Civil Action No. 1:23-cv-06445
Plaintiff,	)	
	)	
V.	)	
	)	
GS LABS, LLC,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF OLIVIA CURRIN-BRITT**

I, Olivia Currin-Britt, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am above the age of 18, am competent to testify, and have personal knowledge of all facts set forth herein.
2. I am a Senior Director of Client Success and Certified Revenue Cycle Representative at Savista, LLC (“Savista”).
3. I was a Savista employee at the time Savista entered into the Master Services Agreement (the “Agreement”) with GS Labs on November 23, 2021.
4. GS Labs hired Savista to perform debt recovery services for delinquent and/or unpaid patient accounts arising out of its COVID-19 testing sites nationwide.
5. The sites for which Savista was to recover related debt included the COVID-19 testing site GS Labs operated in Warrenville, Illinois.
6. The Agreement expressly contemplated that Savista would “have sole discretion to utilize Savista’s global colleagues to assist in any provision of Savista Services.” Agreement § 10.3.

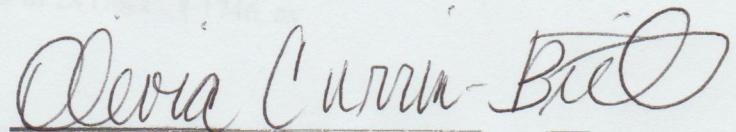
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7. Savista fulfilled its obligations under the Agreement by seeking and recovering payment on behalf of GS Labs from hundreds of delinquent and/or unpaid patient accounts, including some arising out of GS Labs' Warrenville, Illinois testing site.

8. In order to obtain recovery, Savista communicated and negotiated directly with Illinois-based health insurance companies, including Blue Cross and Blue Shield of Illinois, which is headquartered in Chicago, Illinois.

9. For example, from April to July 2023, Savista collected a total of \$3,892,385 in payment from Blue Cross and Blue Shield of Illinois for 9569 delinquent or unpaid patient accounts.

Executed on December 8, 2023

  
Olivia Currin-Britt

Olivia Currin-Britt